

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PERINI/O&G, A JOINT VENTURE,

Plaintiff,

Case No. 12 CV 1931 (VB)

-against-

NOTICE OF MOTION

USIMINAS MECÂNICA S.A.

Defendant.
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PLEASE TAKE NOTICE that, upon the accompanying Declaration of Jeffrey G. Gilmore, its exhibits, the accompanying memorandum of law, the accompanying Local Rule 56.1 Statement of Uncontested Facts, and all prior proceedings in this action, Defendant Usiminas Mecânica S.A. will move this Court, before the Honorable Vincent L. Briccetti, Courtroom 620, 300 Quarropas Street, White Plains, NY 10601, at a date and time determined by the Court, in accordance with Rule 56 of the Federal Rules of Civil Procedure, for an order:

- (a) granting Defendant's Motion for Summary Judgment and dismissing all claims against Usiminas Mecânica S.A. on the grounds that the material facts are undisputed; and
- (b) for such other relief as the Court deems just and proper.

Dated: April 7, 2014

AKERMAN LLP

s/ Jeffrey Gilmore

By: _____

Jeffrey G. Gilmore (Admitted pro hac vice)
Pavan I. Khoobchandani (Admitted pro hac vice)
John M. Neary (Admitted pro hac vice)
750 9th Street, N.W., Suite 750
Washington, D.C. 20001
Telephone: (202) 393-6222
Fax: (202) 393-5959

E-mail: jeff.gilmore@akerman.com
E-mail: pik@akerman.com
E-mail: john.neary@akerman.com

Martin Domb
666 Fifth Avenue, 20th Floor
New York, New York 10103
Telephone: (212) 880-3800
Fax: (212) 880-8965
E-mail: martin.domb@akerman.com

Attorneys for Defendant Usiminas Mecânica S.A.